

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

PRECISION ENGINEERING, LTD.,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 06-110 (GMS)
)	
LORD CORPORATION and)	
LORD FAR EAST, INC.,)	
)	JURY TRIAL DEMANDED
Defendants.)	

JOINT MOTION FOR REVISED SCHEDULING ORDER

Plaintiff Precision Engineering, Ltd., and Defendants Lord Corporation and Lord Far East, Inc., by and through their counsel, jointly move this Court to extend all scheduling deadlines by 90 days for the reasons set forth herein.

The Court's July 14, 2006 Scheduling Order provides that all discovery in this case, including expert discovery, be completed on or before July 2, 2007, sets forth deadlines for dispositive motions and pretrial matters, and schedules trial beginning on November 5, 2007.

Since the Court's July 14, 2006 Scheduling Order, the parties have exchanged documents and served and responded to interrogatories and requests for admission. In December 2006, the parties commenced good-faith negotiations to resolve disputes between them, including the matters that are the subject of this litigation. The parties placed additional discovery on hold during the pendency of the negotiations. Under the current deadlines, the parties can no longer await further discovery and would have to move forward with depositions of witnesses that would require domestic and international travel. In order to facilitate the continued negotiations and potential amicable resolution of this matter, the parties jointly request

that all deadlines be extended by 90 days. A proposed amended scheduling order has been submitted with this motion.

PRECISION ENGINEERING, LTD.

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LORD FAR EAST, INC.

By their attorneys:

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[PROPOSED] SCHEDULING ORDER NO. 2

On this ____ day of February, 2007, upon the joint motion of the parties and the Court having held a telephonic conference with the parties on February 16, 2007;

IT IS ORDERED that:

All deadlines set forth in paragraphs 3, 4, 7, 10 and 11 of the Court's Scheduling Order entered on July 14, 2006 shall be extended by 90 days. The Pretrial Conference shall be set for a date on or after January 15, 2008. The date for trial shall be set for a date on or after February 5, 2008. Except as set forth above, the July 14, 2006 Scheduling Order shall remain unchanged.

SO ORDERED, this _____ day of February, 2007.

Honorable Gregory M. Sleet